

FILED  
2020 NOV 6 PM 1:33  
CLERK  
U.S. DISTRICT COURT

JOHN W. HUBER, United States Attorney (#7226)  
CARL D. LESUEUR, Assistant United States Attorney (#16087)  
Attorneys for the United States of America  
Office of the United States Attorney  
111 South Main Street, Suite 1800  
Salt Lake City, Utah 84111-2176  
Telephone: (801) 524-5682  
Email: carl.lesueur@usdoj.gov

---

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION

---

UNITED STATES OF AMERICA,

Plaintiff,

vs.

EDDIE LEE

Defendants.

FELONY INFORMATION

COUNT: Vio. 18 U.S.C. § 1031

Case: 2:20-cr-00375

Assigned To : Shelby, Robert J.

Assign. Date : 11/6/2020

Description: USA v Lee

---

The United States Attorney charges:

**COUNT I**

18 U.S.C. § 1031

On or about February 13, 2012, in the Central Division of the District of Utah,

EDDIE LEE

the defendant herein, did knowingly execute and attempt to execute a scheme and artifice to obtain money and property by means of false and fraudulent pretenses, representations, and promises in contract W912DW-10-D-1019, a contract with the United States with a value of more than \$1,000,000, by submitting an invoice requesting payments under a fraudulently obtained Service Disabled Veteran Owned Small Business (“SDVOSB”) contract. The scheme

was to obtain proceeds of Service Disabled Veteran Owned Small Business (“SDVOSB”) contracts through a joint venture claiming the joint venture qualified for SDVOSB contracts while knowing that it did not. The manner and means of executing the scheme included recruiting a veteran to create an SDVOSB which he could then control and dominate, using the SDVOSB to create a joint venture with a non-qualified SDVOSB company, using the joint venture to bid for SDVOSB contracts and falsely certifying that the veteran and his business earned a majority of the profits and had control over all decisions of the joint venture, while excluding the veteran from all major business decisions and oversight of the joint venture, submitting invoices to the United States to secure payment on fraudulently obtained contracts, excluding the veteran and his business from decisions for how to allocate the funds received upon those invoices, and permitting the veteran only nominal responsibility and benefit from the joint venture, all in violation of 18 U.S.C. § 1031.

Dated: November 6, 2020

JOHN W. HUBER  
United States Attorney

*/s/Carl D. LeSueur*

---

CARL D. LESUEUR  
Assistant United States Attorney